

**Amendments to the Drawing Figures:**

The attached drawing sheets include proposed changes to FIGS. 1 and 2, and replace the original sheets including FIGS. 1 and 2. More particularly, FIGS. 1 and 2 have been amended to include the legend ---Prior Art---, in response to the Examiner's objection.

This change does not introduce new matter. Accordingly, an indication of approval of the newly submitted drawing is respectfully requested.

Attachment: Replacement Sheets

**REMARKS/DISCUSSION OF ISSUES**

***Claim Summary***

By this Amendment, claims 1-8 have been amended to correct informalities in the claim language and to more clearly define the invention, as discussed below. Further, independent claims 9-17 have been submitted for the Examiner's consideration.

Claims 1-17 are pending in the application. Applicants respectfully submit that all pending claims are in condition for allowance.

***Drawings***

The Examiner objected to Figures 1 and 2, asserting that it should be designated by a legend such as ---Prior Art--- because only that which is old is illustrated. *See* Office Action, p. 2. Figures 1 and 2 have been amended to include the legend ---Prior Art---. No new matter has been introduced in the application by this amendment.

Accordingly, an indication of approval of the drawings, including the newly submitted drawing, is respectfully requested.

***35 U.S.C. § 102 Rejection - Claims 1-7***

The Office Action of January 24, 2008, rejects claims 1-7 under 35 U.S.C. § 102(b) as being anticipated by SHANNON et al. (WO 01/20591). Applicants respectfully traverse the rejection because SHANNON et al. does not disclose each and every element of the claims.

Applicants rely at least on the following standards with regard to proper rejections under 35 U.S.C. § 102. Notably, anticipation requires that each and every element of the claimed invention be disclosed in a single prior art reference. *See, e.g., In re Paulsen*, 30 F.3d 1475, 31 USPQ2d 1671 (Fed. Cir. 1994); *In re Spada*, 911 F.2d 705, 15 USPQ2d 1655 (Fed. Cir. 1990); *W.L. Gore & Assoc., Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303, 313 (Fed. Cir. 1983). Alternatively, anticipation requires that each and every element of the claimed invention be embodied in a single prior art device or practice. *See, e.g., Minnesota Min. & Mfg. Co. v. Johnson & Johnson Orthopaedics, Inc.*, 976 F.2d 1559, 24 USPQ2d 1321

(Fed. Cir. 1992). For anticipation, there must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention. See, e.g., *Scripps Clinic & Res. Found. v. Genentech, Inc.*, 927 F.2d 1565, 18 USPQ2d 1001 (Fed. Cir. 1991).

Applicants' silence on certain aspects of the rejection is by no means a concession as to their propriety. Rather, because the applied art fails to disclose at least one feature of the claims, for at least the reasons discussed below, Applicants respectfully submit that the rejection is improper and should be withdrawn.

#### Claim 1

Independent claim 1 recites, in part:

*"... an array of addressable pixels, each pixel having a display element and a control circuit for controlling operation of the display element, the control circuit comprising: a charge storage capacitor and a photosensitive device coupled to the storage capacitor for regulating charge stored on the storage capacitor in accordance with light received by the photosensitive device; ... and means for independent voltage control of a control terminal of the photosensitive device."*

SHANNON et al. does not teach or suggest at least these features. The Office Action asserts that the photosensitive device is disclosed by photodiode 38 of FIG. 3 in SHANNON et al. See Office Action, p. 3. The Office Action goes on to assert that the means for independent voltage control of a control terminal of the photosensitive device is disclosed by line 30 of FIG. 3, which supplies drive voltage  $V_D$ . However, line 30 does not control or otherwise provide voltage to a control terminal of the photodiode 38, asserted to be the photosensitive device. Rather, line 30 provides the drive voltage  $V_D$  to a different photodiode, i.e., display element 20. Therefore, SHANNON et al. at least does not teach or suggest means for independent voltage control of a control terminal of the photosensitive device.

Accordingly, for at least the reasons stated above, Applicants respectfully submit that claim 1 is allowable, and request withdrawal of the rejection of claim 1 under 35 U.S.C. § 102(b).

Claims 2-7

With regard to claims 2-7, Applicants assert that they are allowable at least because they depend, directly or indirectly, from independent claim 1, which Applicants submit has been shown to be allowable, as well as in view of their additional recitations.

For example, claim 3 recites that the photosensitive device comprises a thin film transistor of the same conductivity type as a conductivity type of the driving element and the addressing element. As stated above, the Office Action asserts that the photosensitive device is disclosed by the photodiode 38 of FIG. 3 in SHANNON et al. The photodiode 38 does not teach or suggest a thin film transistor, or a thin film transistor of the same conductivity type as that of the driving element and the addressing element.

***35 U.S.C. § 103 Rejection - Claim 8***

The Office Action of January 24, 2008, rejects claim 8 under 35 U.S.C. § 103(a) as being unpatentable over SHANNON et al. in view of KURIBAYASHI et al. (U.S. Patent No. 6,373,455). Applicants respectfully traverse the rejection for at least the reasons set forth below.

Applicants assert that claim 8 is allowable at least because it depends indirectly from independent claim 1, which Applicants submit has been shown to be allowable, as well as in view of its additional recitations. Further, the Examiner relies on KURIBAYASHI et al. only to teach an independent voltage control means comprising duty cycle control means. KURIBAYASHI et al. therefore does not cure the deficiencies of SHANNON et al., discussed above.

***New Claims 9-17***

Applicants respectfully submit that independent claims 9 and 17 are allowable for substantially the same reasons as discussed above with respect to claim 1. Also, claims 9 and 17 respectively recite a photosensitive transistor and a third transistor to regulate a charge stored on the capacitor in accordance with light from the display element. In contrast, the

Examiner relies on a photosensitive diode of SHANNON (*i.e.*, photosensitive diode 38), which does not disclose a transistor, as discussed above with respect to claim 3.

With regard to claims 10-16, Applicants assert that they are allowable at least because they depend, directly or indirectly, from independent claim 9, which Applicants submit has been shown to be allowable, and in view of their additional recitations.

**CONCLUSION**

No other issues remaining, reconsideration and favorable action upon the claims 1-17 now pending in the application are requested.

If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted on behalf of:  
Phillips Electronics North America Corp.



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